

EXHIBIT 3

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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16
17
18 SONOS, INC.,

19 Plaintiff and Counter-
20 Defendant,

21 vs.

22 GOOGLE LLC,

23 Defendant and Counter-
24 Claimant.

Case No. 3:20-cv-06754-WHA

Related to Case No. 3:21-cv-07559-WHA

**GOOGLE LLC'S RULE 26(a)(3)
WITNESS LIST**

1 Google LLC (“Google”) hereby provides its witness list pursuant to Federal Rule of Civil
2 Procedure 26(a)(3) and paragraphs 1 and 2(a) of the Guidelines for Trial and Final Pretrial
3 Conference in Civil Jury Cases Before the Honorable William Alsup.

4 Google identifies the name and, if not previously provided, the address, telephone number,
5 and anticipated testimony of each witness it may present at trial other than solely for impeachment
6 — separately identifying those Google expects to present and those it may call if the need arises.
7 The inclusion of a witness on Google’s list of potential witnesses does not represent that Google
8 will call (or otherwise require that Google calls) that witness to testify, does not constitute a
9 representation that Google will bring an identified potential witness to trial, and does not mean that
10 Google has the power to compel the attendance or live testimony of that potential witness. Google’s
11 listing of potential witnesses and designations of deposition testimony is also made based on
12 Google’s present understanding of the trial date, the availability of potential witnesses, and the
13 issues. In the event that an individual whom Google identified as a potential witness is not available
14 for trial or otherwise cannot testify in person, Google may designate a replacement witness to testify
15 either in person or by deposition, and will provide reasonable notice to Sonos, Inc. (“Sonos”).

16 Google reserves the right to call any witness on any of Sonos’s witness lists. Google further
17 reserves the right to supplement this list based on discovery not yet taken in the case. Google also
18 reserves the right to call rebuttal witnesses who are not listed below to testify at trial either in person
19 or by deposition in response to the testimony offered by Sonos and/or with respect to any defenses
20 or issues on which Sonos bears the burden of proof. Google reserves the right to call additional
21 witnesses to testify at trial either in person or by deposition to provide foundation testimony should
22 any party contest the authenticity or admissibility of any material proffered at trial. After the parties
23 exchange objections to such materials, Google will address this issue with Sonos and/or the Court,
24 and will provide notice of any additional witnesses it will or may call to establish the authenticity
25 and admissibility of materials to be proffered at trial.

26 After the parties complete their pretrial exchanges and the Court rules on motions or other
27 disputes that are presented during pretrial, Google reserves the right to further clarify the witnesses
28

it will call and whether the respective witnesses will provide their testimony in person or by deposition.

I. WITNESSES GOOGLE WILL PRESENT AT TRIAL

Name	Contact Information	Substance of Testimony
Christopher Bakewell	May be reached through counsel for Google.	Mr. Bakewell will provide non-cumulative testimony regarding damages for infringement of U.S. Patent Nos. 10,469,966 (“’966 patent”), 10,779,033 (“’033 patent”), and 10,848,885 (“’885 patent”) (collectively, “Asserted Patents”).
Kristen Bender	Last known address: Los Angeles, California	Ms. Bender will provide non-cumulative testimony regarding Google’s and Sonos’s collaboration on the integration of Google’s music services into Sonos’s products and the contract(s) governing the same.
Dr. Bobby Bhattacharjee	May be reached through counsel for Google.	Dr. Bhattacharjee will provide non-cumulative testimony regarding the non-infringement, invalidity, non-infringing alternatives, usage and/or value of the ’033 patent.
Arthur “Tad” Coburn	Last known address: Lexington, Massachusetts	Mr. Coburn will provide non-cumulative testimony regarding his purported invention and conception or reduction to practice of the ’033 patent as well as Google’s and Sonos’s collaboration on the integration of Google’s music services into Sonos’s products.
Debajit Ghosh	May be reached through counsel for Google.	Mr. Ghosh will provide non-cumulative testimony concerning Google, the relationship between Google and Sonos, the accused hardware and software products, usage or non-usage of the accused functionalities,

Name	Contact Information	Substance of Testimony
		the design and development of the accused casting playback of queues functionality, and Google's and Sonos's collaboration on the same.
Andre Jardini	May be reached through counsel for Google.	Mr. Jardini will provide non-cumulative testimony concerning damages Google sustained in defending Sonos's infringement claims for the '033 patent and U.S. Patent No. 9,967,615.
Ken Mackay	May be reached through counsel for Google.	Mr. Mackay will provide non-cumulative testimony regarding the origin of speaker grouping, the design of Google's speaker grouping, and the availability, acceptability, and implementation of non-infringing alternative designs. Google further identifies the subjects of the Rule 30(b)(6) topic(s) for which Mr. Mackay was designated as Google's corporate witness.
David Nicholson	May be reached through counsel for Google.	Mr. Nicholson will provide non-cumulative testimony concerning the design and development of the accused casting playback of queues functionality for YouTube and YouTube Music.
Dr. Dan Schonfeld	May be reached through counsel for Google.	Dr. Schonfeld will provide non-cumulative testimony regarding the non-infringement, invalidity, non-infringing alternatives, usage and/or value of the '966 and '885 patents.
Tom Varner	May be reached through counsel for Google.	Mr. Varner will provide non-cumulative testimony concerning damages for Google's breach of contract and conversion claims.

II. WITNESSES GOOGLE MAY PRESENT AT TRIAL IF THE NEED ARISES

Name	Contact Information	Substance of Testimony
Ramona Bobohalma ¹	May be reached through counsel for Google.	Ms. Bobohalma may provide non-cumulative testimony concerning the accused casting playback of queues functionality for YouTube and YouTube Music and the design and development of YouTube Remote.
Chris Chan	May be reached through counsel for Google.	Mr. Chan may provide non-cumulative testimony concerning the design, development, and usage of the accused functionalities as well as the marketing of accused media players. Google further identifies the subjects of the Rule 30(b)(6) topic(s) for which Mr. Chan was designated as Google's corporate witness.
John Evans	May be reached through counsel for Google.	Mr. Evans may provide non-cumulative testimony concerning Google's and Sonos's collaboration on the integration of Google's music services into Sonos's products.
Paul Joyce	May be reached through counsel for Google.	Mr. Joyce may provide non-cumulative testimony concerning Google's and Sonos's collaboration on the integration of Google's music services into Sonos's products.
Pawel Jurczyk	May be reached through counsel for Google.	Mr. Jurczyk may provide non-cumulative testimony concerning alternatives to the accused functionalities and products.
Eugene Koh	May be reached through counsel for Google.	Mr. Koh may provide non-cumulative testimony concerning the design and development of Tungsten/Nexus Q.

¹ If called, this witness may need to testify remotely.

Name	Contact Information	Substance of Testimony
Janos Levai	May be reached through counsel for Google.	Mr. Levai may provide non-cumulative testimony concerning the design and development of the accused casting playback of queues functionality for YouTube and YouTube Music and the design and development of YouTube Remote.
Logitech Inc.	Last known address: 7700 Gateway Boulevard Newark, California 94560	Logitech may provide non-cumulative testimony concerning Logitech prior art related to the Asserted Patents.
Vincent Mo	May be reached through counsel for Google.	Mr. Mo may provide non-cumulative testimony concerning the design and development of the accused casting playback of queues functionality for YouTube and YouTube Music as well as alternatives to accused functionalities and products. Google further identifies the subjects of the Rule 30(b)(6) topic(s) for which Mr. Mo was designated as Google's corporate witness.
Tomer Shekel ²	May be reached through counsel for Google.	Mr. Shekel may provide non-cumulative testimony concerning Google's multizone technology and disclosure to Sonos.
Witness on YouTube "Autoplay" and "UpNext functionality" ³	May be reached through counsel for Google.	Google will present a witness who will provide non-cumulative testimony concerning the design and operation of the YouTube, YouTube Music, YouTube Kids, and YouTube TV "AutoPlay" and "UpNext" functionalities.

² If called, this witness may need to testify remotely.

³ Google will identify this witness once Sonos takes a deposition on this topic pursuant to Dkt. 495.

1 **III. WITNESSES WHO MAY TESTIFY BY DEPOSITION**

2 The following witnesses may testify by deposition:

3 Jeffrey Armstrong

4 Steve Beckhardt

5 Kristen Bender

6 Chris Butts

7 Tad Coburn

8 Keith Corbin

9 David DesRoches

10 Allison Elliott

11 Graham Farrar

12 Adam Graham

13 Joni Hoadley

14 Jason Kendall

15 Brandon Kennedy

16 Alaina Kwasizur

17 Robert Lambourne

18 Nick Millington

19 Juergen Schmerder

20 Andrew Schulert

21 Jeff Torgerson

22 Christina Valente

23
24 DATED: April 3, 2023

QUINN EMANUEL URQUHART & SULLIVAN, LLP

25
26 By /s/ Charles K. Verhoeven

27 Charles K. Verhoeven

28 Attorneys for Google LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via email on April 3, 2023.

/s/ Lana Robins
Lana Robins